

**Hearing Date: December 16, 2010 at 10:00 am ET**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

\_\_\_\_\_/

In re:

DELPHI CORPORATION, *et al.*,  
  
Debtor.

Chapter 11  
Case No. 05-44481-RDD  
Jointly Administered

**ACCESS ONE TECHNOLOGY GROUP, LLC'S RESPONSE TO REORGANIZED  
DEBTORS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINTS**

Defendant Access One Technology Group, LLC ("Access One"), through its attorneys, Wolfson Bolton PLLC, and for its Response to Reorganized Debtors' Motion for Leave to File Amended Complaints ("Motion") [Adv. Proc. No. 39]<sup>1</sup> states:

Access One is similarly situated to many other defendants that filed First Wave Motions (as that term is used in the Order Granting in Part First Wave Motions to Dismiss). Accordingly, because the arguments in opposition to Reorganized Debtors' Motion for Leave to File Amended Complaints raised by other defendants that filed First Wave Motions apply with equal force to Access One, Access One expressly joins and incorporates by reference the arguments raised by other defendants in opposition to Reorganized Debtors' Motion for Leave to File Amended Complaints.

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<sup>1</sup> Access One is a defendant in Adversary Proceeding No. 07-02142.

WHEREFORE, Access One respectfully requests that this Court (I) deny the Motion; (II) award Access One its fees and costs incurred in connection with this Response to Reorganized Debtors' Motion for Leave to File Amended Complaints; and (III) grant Access One such other relief as the Court deems just and proper.

Respectfully submitted,

WOLFSON BOLTON PLLC  
*Attorneys for Access One*

Dated: November 23, 2010

By: /s/ Anthony J. Kochis  
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**CERTIFICATE OF SERVICE**

I certify that on November 23, 2010, I caused Access One Technology Group, LLC's Response to Reorganized Debtors' Motion for Leave to File Amended Complaints to be electronically filed with the Clerk of the Court using the ECF system, which sent notification of such filing to all ECF participants requesting electronic service.

The following parties were also served via overnight Federal Express on November 23, 2010:

Hon. Robert D. Drain U.S. Bankruptcy Court Southern District of New York White Plains Office 300 Quarropas Street White Plains, NY 10601	
Eric B. Fisher Butzel Long 380 Madison Avenue 22 <sup>nd</sup> Floor New York, NY 10017	Office of United States Trustee Attn: Alicia M. Leonhard, Trace Hope Davis and Brian Masumoto 33 Whitehall St. 21 <sup>st</sup> Floor New York, NY 10004

Dated: November 23, 2010

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